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*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,
v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Chapter 7 Estate of Bernard L.
Madoff,

Plaintiff,
v.

UBS EUROPE SE, formerly known as UBS
Deutschland AG, as successor in interest to
Dresdner Bank Lateinamerika AG, and LGT
BANK (SWITZERLAND) LTD. as successor in
interest to Dresdner Bank (Schweiz) AG,

Defendants.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 12-01577 (CGM)

**DECLARATION OF DEAN D. HUNT
IN SUPPORT OF TRUSTEE'S
MEMORANDUM OF LAW IN
OPPOSITION TO DEFENDANT LGT
BANK (SWITZERLAND) LTD'S
MOTION TO DISMISS**

I, Dean D. Hunt, declare the following:

1. I am a member in good standing with the bars in which I am admitted, I have been admitted to this Court pro hac vice, and am a partner with the law firm of Baker & Hostetler LLP, counsel to Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the chapter 7 estate of Bernard L. Madoff.

2. I submit this Declaration in support of the Trustee’s Memorandum of Law in Opposition to Defendant LGT Bank (Switzerland) LTD’s (“LGT Swiss”) Motion to Dismiss.

3. Although several documents attached to this Declaration are stamped confidential, the Trustee’s records indicate that the producing parties have de-designated the documents as not confidential under the Litigation Protective Order entered in this liquidation. *See SIPC v. BLMIS (In re BLMIS)*, Adv. Pro. No. 08-01789 (CGM) (Bankr. S.D.N.Y. June 6, 2011 & Sept. 17, 2003), ECF Nos. 4137 & 5474. In addition, all personal identifying information has been redacted.

4. Attached as Exhibit 1 are true and correct copies of Claim Nos. 015023 and 015374, both dated July 2, 2009, filed by LGT Bank (Switzerland) Ltd. (MWPTAP00576813 and MWPTAP00582461).

5. Attached as Exhibit 2 is a true and correct copy of a May 11, 2009, Commerzbank Press Release regarding the merger of Dresdner Bank AG into Commerzbank AG. Available publicly at https://www.commerzbank.com/en/hauptnavigation/presse/pressemitteilungen/archiv1/2009/quartal_09_02/presse_archiv_detail_09_02_5610.html.

6. Attached as Exhibit 3 is a true and correct copy of a June 2003 email chain between Dominik Morabito of Dresdner Schweiz to Philip Toub of FGG New York. (FG-05926981-82)

7. Attached as Exhibit 4 is a true and correct copy of a June 24, 2003 email from Dominik Morabito of Dresdner Schweiz to Philip Toub of FGG New York. (FG-05926983-84)

8. Attached as Exhibit 5 is a true and correct copy of a July 17, 2006 email from Florian Deisler of Dresdner Schweiz to Philip Toub requesting information on Fairfield funds (FG-05725075-77).

9. Attached as Exhibit 6 is a true and correct copy of a June 6, 2007 email chain between Xaver Kurzen of Dresdner Schweiz and Lauren Ross of FGG New York. (FG-0036752-54)

10. Attached as Exhibit 7 is a true and correct copy of a Fairfield Sentry Private Place Memorandum dated July 1, 2003. (SECSEV2137283)

11. Attached as Exhibit 8 is a true and correct copy of Sentry subscription agreement dated June 12, 2008, for Citco Client Number 190052 (Dresdner Schweiz).

12. Attached as Exhibit 9 is a true and correct copy of Sentry short form subscription agreement dated June 20, 2008, for Citco Client Dresdner Schweiz. (ANWAR-CFSE-00116811-14)

13. Attached as Exhibit 10 is a true and correct copy of a Citco redemption form dated Oct. 11, 2007, directing proceeds from redemption be deposited with HSBC Bank USA, New York. (ANWAR-CFSE-00188747)

14. Attached as Exhibit 11 is a true and correct copy of a Citco redemption form dated Nov. 15, 2007, directing proceeds to be deposited with HSBC Bank USA, New York. (ANWAR-CFSE-00191794-98)

15. Attached as Exhibit 12 is a true and correct copy of a Citco redemption confirmation form dated Dec. 14, 2007, directing proceeds to be deposited with HSBC Bank USA, New York. (ANWAR-CFSE-00195394-398)

16. Attached as Exhibit 13 is a true and correct copy of a Citco redemption placed on February 22, 2008, directing proceeds to be deposited with HSBC Bank USA, New York (ANWAR-CFSE-00103440-447)

17. Attached as Exhibit 14 is a true and correct copy of a Citco redemption placed by Defendant and received by Citco on March 17, 2008, directing proceeds from redemption to be deposited with HSBC Bank USA, New York. (ANWAR-CFSE-00105891-896)

18. Attached as Exhibit 15 is a true and correct copy of a Citco redemption form dated May 14, 2008, directing proceeds to be deposited with HSBC Bank USA, New York. (ANWAR-C-ESI-00578625)

19. Attached as Exhibit 16 is a true and correct copy of a Citco Redemption Form dated June 20, 2008 directing proceeds from redemption of 100.551 shares to be deposited with HSBC Bank USA, New York. (ANWAR-C-ESI-00579002)

20. Attached as Exhibit 17 is a true and correct copy of a Citco redemption form dated Nov. 11, 2008, directing proceeds to be deposited with HSBC Bank USA, New York. (ANWAR-CFSE-00125771)

21. Attached as Exhibit 18 is a true and correct copy of a Citco redemption form dated Nov. 17, 2008, directing proceeds to be deposited with HSBC Bank USA, New York. (ANWAR-CFSE-00127646)

22. Attached as Exhibit 19 is a true and correct copy of a Citco confirmation form dated March 17, 2006, directing proceeds to be deposited with HSBC Bank USA, New York. (ANWAR-CFSE-00218811-30)

23. Attached as Exhibit 20A is a table of Citco client numbers showing Dresdner's client number with Citco is 190052, formatted from a true and correct copy of the table (provided as Ex. 20B) for legibility.

24. Also attached as Exhibit 20B is a true and correct copy of a table of Citco client numbers showing Dresdner's client number with Citco is 190052. (SECSEV1955526-73)

25. Attached as Exhibit 21 is a true and correct copy of a Letter of Understanding between Dresdner Schweiz and FGG executed on March 8, 2004. (ANWAR-CFSE-00501242-246)

26. Attached as Exhibit 22 is a true and correct copy of a June 2007 email chain between Werner Vogt of Dresdner Schweiz and FGG NY. (ANWAR-C-ESI-00293720-728)

Dated: November 14, 2022
Houston, Texas

By: /s/ Dean D. Hunt
Dean D. Hunt